

EXHIBIT C

**UNITED STATES DISTRICT COURT
Western District of Texas
Austin Division**

JEAN JONES,
Plaintiff

v.

PORTFOLIO RECOVERY
ASSOCIATES LLC
PORTFOLIO SERVICES, LLC, and
WESTERN SURETY COMPANY
Defendants.

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CASE NUMBER: 1:16-cv-00572-RP

DECLARATION OF CELETHA C. CHATMAN

I, Celetha C. Chatman, Esq., being first duly sworn on oath, deposes and states as follows:

1. That I am the attorney for the Plaintiff above named.
2. I have read the Complaint filed in this action and know the contents thereof, and that the same is true of my knowledge.
3. That I am admitted to practice within the State Courts of Illinois as of November 5, 2015.
4. That I am a member of the Bar of the United States District Court for the Northern District of Illinois.
5. That I am a member of the Bar of the United States District Court for the Western District of Texas.
6. That I am member of the Bar of the Bankruptcy Court for the Northern District of Illinois.
7. That I have significant experience in FDCPA litigation, which is the focus of my practice

8. That I am or have been counsel to more than 500 FDCPA cases in the Northern District.

9. That my prior rate of \$295 per hour has been granted over Defendant's objections by the Honorable Rebecca R. Pallmeyer in *Jennifer Holloway v. Portfolio Recovery Associates LLC*, 15-cv-11568 (NDIL).

10. That my prior rate of \$315 per hour has been approved in *Chatman v. Stellar Recovery, Inc.*, 16-cv-00833 (NDIL) and *Rhone v. MBB*, Case No. 16-cv-05215 (NDIL) (2019) (rev'd on other grounds).

11. That my currently hourly rate is \$335, a 6.5% increase from 2016 rates.

12. That my current hourly rate of \$335.00 for work that I do in federal court, is justified by my experience, the nature and complexity of the cases, and the relative risk involved in consumer cases.

13. That my current hourly rate has been approved over Defendant's objections in *Lloyd v. Credit Systems International, Inc.* Case No. 18-cv-04267 (NDIL)(2019).

14. That the following is a sample of my FDCPA class actions:

Ramirez v. Midland Funding LLC. et al., 17-cv-02626 (N.D. IL)

Zulku v. I.Q. Data Internatioanl, Inc., 19-cv-03675 (N. D. IL)

Streeter v. UHG I LLC. et al., 19-cv-08474 (N.D. IL)

Ruvalcaba v. LVNV Funding LLC et al., 20-cv-00140 (N.D. IL)

Morris v. Jefferson Capital Systems, LLC. et al., 20-cv-00017 (N.D. IL)

15. That attached time and work records are true and correct copies of my time and billing records in this matter.

16. I wrote off 1.4 hours of time spent on clerical tasks such as filing an appearance, compiling discovery, mailing documents, and filing other documents.

17. In addition, I exercised my billing judgment and did not bill for approximate 6 additional hours of time spent on this case because such time was unproductive (i.e., dead-end research); redundant (reviewing arguments made in prior briefing); or otherwise non-billable (i.e., emails about dates, deadlines, and scheduling, and time spent drafting administrative portions of the brief, such as the caption or certificates of compliance).

18. All time billed for conferring with Plaintiff's other attorneys was purely spent discussing legal strategy and tactics. I did not bill for any time conferring about administrative items or non-billable matters or tasks.

Pursuant to 28 U.S.C. § 1746(2), I, Celetha C. Chatman, hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: April 6, 2020

s/Celetha C. Chatman

Celetha C. Chatman

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